# Attachment 2b California Integrated Waste Management Board

Agenda Item 4

## Base Year Modification Request Certification Part 1: Generation Study - No Extrapolation Diversion Data

To request a substitution for a previously approved base year used in calculating the diversion rate report year generation study for your jurisdiction, please complete and sign this form and return it to your Office of Local Assistance (OLA) representative at the address below, along with any additional information requested by OLA staff. When all documentation has been received, your OLA representative will work with you to prepare for your appearance before the Board. If you have any questions about this process, please call (916) 341-6199 to be connected to your OLA representative.

Mail completed documents to:

California Integrated Waste Management Board Office of Local Assistance 1001 I Street, (MS-25) PO Box 4025 Sacramento, CA 95812-4025

existing Board-approved base year to a new base year.

Please select the **ONE** choice below that best explains your request to the Board.

1. Use a recent generation-based study to calculate our current reporting year generation amount, but not officially change our existing Board-approved base year.

2. Use a recent generation-based study to officially change our

Genera	l Instr	uctions:
--------	---------	----------

The shaded cells on these sheets are protecte using these sheets, please contact your Office	•		ng (916) 341-6199.			
Section I: Jurisdiction Information and	Certification					
All respondents must complete this section.						
I certify under penalty of perjury that the inforr knowledge, and that I am authorized to make			the best of my			
Jurisdiction Name	County					
Campbell	Santa Clara	ı				
Authorized Signature	Title	Title				
Type/Print Name of Person Signing	Date	Date Phone ( ) Include Area Code				
Person Completing This Form (please print or type)	Title					
Bill Helms						
Affiliation:						
Mailing Address	City	State	ZIP Code			
E-Mail Address						

Section II: Information for New Gene	ration-Based S	Study for Existing or New Base Year	
Attach additional sheets if necessary—			(e.g.,"4").
Note: New base years must be represen	tative of a juriso	liction's disposal and diversion.	
1. Current Board-approved existing base y	2. Proposed new generation-based study y	/ear:	
1991		2004	
3. Explain how the proposed generation st	udy year is repres	sentative of average annual jurisdiction disp	osal and diversion:
4. Enter diversion rate information below	W.		
Diversion rate calculated using		Diversion rate calculated using new	
existing base year	a. 40 %	generation-based study	b. 49%
Existing base year pounds/person/day		New generation based study	
based on generation		pounds/person/day based on	
_	8.22	generation	10.15
Existing base year:		New generation based study:	
Residential Non-Residentia	al	Residential Non-Resid	lential
generation 42 % generation	58 %	generation 24 % generat	ion 76 <sup>%</sup>
Population existing generation-based s	udy 35,900	Population new generation-based study	
5. Please explain how the new diversion ra	te is consistent w	rith your current diversion implementation e	fforts and also explain the
specific reasons for the difference.			·
<b>6.</b> If the proposed new generation tonnage with your current diversion implementaion If your pounds per person is over the state	efforts and provid	e examples (e.g., change in jurisdiction's de	

Section III - Disposal and Diversion Information											
1. Disposal Tonnage (enter values):	5455	30911	36366								
	Residential	Non-Residential	Total								
Please select the ONE choice below that best explains yo	ur <b>disposal</b> data a	and complete the required tables.									
<ul> <li>a. All tons claimed are from the Board's Disposal F</li> </ul>	Reporting System	(No explanation required. Go to Number 2.)									
□ b. All tons claimed are from a 100 percent audit of	hauler and self-h	aul tonnage. (Please complete Reporting Year Tonna	ge Request and Modification Certification sheet found at	www.ciwmb.ca.gov/LGCentral/Forms/rytnmdrq.doc and							
submit with											
c. Some Disposal Reporting System data were co	rrected. (Please o	complete Reporting Year Tonnage Modification Reques	st and Certification sheet found at www.ciwmb.ca.gov/LG	Central/Forms/rytnmdrq.doc and submit with the new bas							
year											

2. In the table below, list the summarized diversion activities, tonnages, material types, actual or conversion factors, and diversion data records that support your claim and are available for Board verification Note: The Board expects the jurisdiction to be able to provide all back-up documentation, if requested. Include type of record and location—for example, weight tickets from transfer stations. This section should capture all diversion tonnage (form will perform all addition and percentage calculations). If any diversion is from restricted wastes, agricultural wastes, inert solids [e.g., concrete, asphalt, dirt, white goods, and scrap metal,] you must identify those programs and waste types and complete Section VI. Survey forms for the top ten businesses must be included as an attachment with the generation study year and should be identified as Attachment IVa.

(Note: The Board has indicated that total source reduction amounts greater than five percent will be scrutinized. Please be prepared to substantiate the amounts.)

Note: Detailed Non-Residential waste audit information for the top ten businesses surveyed must be included in Section IV.

http://www.ciwmb.ca.gov/LGCentral/PARIS/Codes/Reduce.htm

Diversion Activity	Total Tons	Percent of Total Generation	Specific Material Type(s) (List diversion program activity w/multiple materials in one box)	Indicate whether Actual Tons or Specific Conversion Factor and Source of Factor	Type of Record (include copy with submittal)
Please use the Board's program types. The program type glossary is online at: www.ciwmb.ca.gov/LGCentral/Paris/Codes /Reduce.htm	(A)	(A/Total Generation)			
Residential Source Reduction Activities					
Backyard composting					
Grasscycling					
Other Residential Source Reduction (lis	t each progra	m separately)			
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Subtotal, Residential Source Reduction	0	0%			
Residential Recycling Activities					
Curbside Recycling	4548	6%	Paper, plastic, glass, aluminum cans	Actual (totals include 955 tons of Multi-Family Units)	Hauler data
Buyback Centers	968	1%	Aluminum, glass, plastic	Actual	DO/C/DOR report
Drop-off Centers					

Diversion Activity	Total Tons	Percent of Total Generation	Specific Material Type(s) (List diversion program activity w/multiple materials in one box)	Indicate whether Actual Tons or Specific Conversion Factor and Source of Factor	Type of Record (include copy with submittal)
Please use the Board's program types.		(A/Total			
The program type glossary is online at:	(A)	Generation)			
www.ciwmb.ca.gov/LGCentral/Paris/Codes	* *	· ·			
/Reduce.htm					
Other Residential Recycling (list each p	rogram sepa	rately)			
City Program					
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Subtotal, Residential Recycling	5516	8%			
Residential Composting Activities	3010	078			
Green Waste Drop-off					
Curbside Green Waste	6302	9%	Grass, leaves, brush, woody debris	Actual	Hauler data
Christmas Tree Program					
Other Residential Composting (list each	n program se	parately)			
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Subtotal, Residential Composting	6302	9%			
Subtotal, Residential Diversion	11818	17%			
Non-Residential Source Reduction					
Activities:					
Non-Residential Waste Audits			Detailed information must be included in Section	1	
	241	0%	V	Detailed information must be included in Section V	Detailed information must be included in Section V
Other Non-Residential Source Reduction	n (list each p	rogram separate	ly)		
City Program	337	0%	Grasscycling in City parks	44.32 acres/7.6 tons/acre/year = 336.83	Public Works
County Program	30	0%	Grasscycling in County parks	4.0 acres/7.6 tons/acre/year = 30.4	Public Works
Schools Program	371	1%	Grasscycling in schools	48.8 acres/7.6 tons/acre/year = 370.88	Public Works
Enter program name			. ·	ĺ	
Enter program name					
Subtotal, Non-Residential Source					
Reduction	979	1%			

Diversion Activity	Total Tons	Percent of Total Generation	Specific Material Type(s) (List diversion program activity w/multiple materials in one box)	Indicate whether Actual Tons or Specific Conversion Factor and Source of Factor	Type of Record (include copy with submittal)
Please use the Board's program types.		(A/Total			
The program type glossary is online at:	(A)	Generation)			
www.ciwmb.ca.gov/LGCentral/Paris/Codes	(-1)				
/Reduce.htm					
Non-Residential Recycling Activities:					
Non-Residential Waste Audits			Detailed information must be included in Section		
Non-Residential Waste Addits	3166	4%	V	Detailed information must be included in Section V	Detailed information must be included in Section V
Other Non-Residential Recycling (list each			,		
_		_			
Drop Boxes	2347	3%	Wood/rock boxes	Actual	Hauler data
C&D Sort	2639	4%	Wood, concrete, roofing	Actual	Hauler data
City ProgramStreet Maintenance	7362	10%	Concrete, asphalt		City records/contract data
City ProgramSidewalk Repair	432	1%	Concrete	3 yr avg ((17292.04 cf x 150)/2000=1297)/3=432	City records/contract data
Commercial Curbside	1165	2%	OCC and Paper	Actual	Hauler data
Subtotal Non-Residential Recycling	17112	24%			
Non-Residential Composting Activities					
Non-Residential Waste Audits			Detailed information must be included in Section		
	255	0%	V	Detailed information must be included in Section V	Detailed information must be included in Section V
Other Non-Residential Composting (list e	each program	m separately)			
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Enter program name					
Subtotal Non-Residential Composting	255	0%			
Subtotal Non-Residential Diversion	18347	26%			
Other Diversion Activities					
(Note: If you are unable to provide the act	ual residenti	ial/non-residenti	al split, please provide your best estimates of the	split in each program type or put all the diversion und	ler non-residental.
Residential					
ADC					
Sludge (must submit sludge cert form)					
Scrap Metal					
Construction and Demolition					
Landfill Salvage	131	0%	Wood, mixed debris	Actual	Landfill records
Other (e.g., ag waste)					
Subtotal Residential Waste	131	0%			

Diversion Activity	Total Tons	Percent of Total Generation	Specific Material Type(s) (List diversion program activity w/multiple materials in one box)	Indicate whether Actual Tons or Specific Conversion Factor and Source of Factor	Type of Record (include copy with submittal)
Please use the Board's program types.		(A/Total			
The program type glossary is online at:	(A)	Generation)			
www.ciwmb.ca.gov/LGCentral/Paris/Codes	( )	,			
Reduce.htm					
Non-Residential					
ADC				DRS Reported 961. Guadalupe contributed 908 which i	d
ADC				included in the hauler data for Residential Compost and	
				Drop Boxes. This tonnage has been subtracted to avoid	
	53	0%	Green waste and C&D Material	double counting.	DRS
Water Recharge Program (SCVWD)	0	0%	Silt	Water district estimation.	Santa Clara Valley Water District
Scrap Metal					,
Construction and Demolition					
Landfill Salvage	1567	2%	Rock, concrete, other C&D	Actual	Landfill records/C&D operation began in 2001
Landfill Salvageother sites	2838	4%	Rock, concrete, other C&D	Actual (Deducted 3 tons possible white goods)	Landfill records/C&D operation began in 2001
Other (e.g., ag waste)					
Subtotal Non-Residential Waste					
	4458	6%			
Subtotal Residential/		0,0			
Non-Residential Other Diversion	4589	6%			
	4589	6%			
Total Residential/Non-Residential					
Source Reduction Tons	979	1%			
Total Diversion Tons	34754	49%			
	001	1070			
Total Disposal Tons from Number 1	36366	51%			
Total Generation Tons (Div+Dis)	71120				
NEW GENERATION STUDY					
DIVERSION RATE	49%				
	alculations -	Biomass and Tra	ansformation Activities (Note: you cannot claim be	oth biomass and transformation.)	
Biomass (must submit biomass cert form					
and must be 10% or less of generation-use the calculator to calculate)					
Transformation					
Report Year Diversion Rate with			•	•	•
•					
Biomass or Transformation					
Credit					

Board Meeting
July 18, 2006

Agenda Item 4
Attachment 2b

#### Section IV - Specific Non-Residential Sector Waste Audits

Top 10 Non-Residential Generators

Please complete this table for the top ten non-residential businesses that were surveyed. **Use the business type in lieu of the specific business name**(e.g., grocery store vs. Bestway Grocery Store) List each non-residential business separately from largest to smallest, based on total diversion tons. Audit reference number should be the same number used to identify businesses on the survey/audit sheets, and must be identical to the data in the Section V spreadsheet.

Audit Reference Numbe	Type of Non-Residential Generator	Include Material Type (e.g., paper, grasscycling). (List materials on one line)	Source Reduction Tons	Recycling Tons	Composting Tons	Total Diversion Tons	Generation (Total Diversion Tons/Total	Survey Method Phone (P) Mail (M) On-site (O) Other
KN-8	Recycler	OCC, paper, plastics, aluminum		759		759.19	1.1%	O,M
KN-1	Grocery	Cardboard, plastic, bone & fat, produce		459		458.87	0.6%	O,M
ZN-1	Grocery	Cardboard, food waste, plastic		232	219	451	0.6%	0
KN-3	Grocery	Produce, bakery goods, tallow, cardboard	9	294	36	339.405	0.5%	0
ZN-4	Retail	Cardboard, pallets		302		301.6	0.4%	O,M, P
KN-11	Recycler/shredder	Paper		240		240		P, M
ZN-2	Grocery	Cardboard		218		218	0.3%	0
KN-5	Lumber	Metal, cardboard, wood		202		202	0.3%	O, M
KN-9	Recycler/shredder	Paper		199		199	0.3%	P
ZN-5	Distributor	Sheetrock, pallets		81		81	0.1%	0
	Total		9.075	2985.69	255.3	3250.065	4.6%	

### Section V - Non-Residential Generator Audit Diversion Spreadsheet

Use the type of business and audit reference number in lieu of the specific business name. For each business include the diversion activity and material type and associated tonnage for each diversion activity/material type, and applicable conversion factors and sources. Copies of the audit survey form(s) for each of the top ten businesses should be included as an attachment. Click on the Section Button to add a section for another generator (ten rows and a subtotal row added to the table for each new generator). If you have any questions, please contact your OLA Representative at (916) 341-6199.

Add Section

Non-Residential Gen	erator Audit Diversior	1					
Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
KN 1	Grocery	Cardboard	Actual		269.57		269.57
		Plastic	Actual		8.32		8.32
		Bone & Fat	Actual		33.28		33.28
		Organics-Produce	Actual		147.7		147.7
Subtotal -				0	458.87	0	458.87
KN-2	Retail	Cardboard	1 bale per week @ 1000 lbs x 52=78,000 / 2000 lbs - 26 tons. Estimate provided by company. Verified onsite.		26		26
		Toner Cartridges	20/week @ 2.5 x 52 / 2000 USEPA		1.3		1.3
Subtotal -				0	27.3	0	27.3
KN-3	Grocery	Organics-Produce	4'x3'x3' per day estimated @ 200 lbs x 363 days year/2000			36.3	36.3
		Bakery Products	2 carts estimated @ 25 lbs each per day. 2x25=50 lbs x 363/2000	9.075			9.075
		Fat, Bones, Tallow	2 - drums /day @ 200 lbs. each (per staff at rendering facility) x 363/2000		72.6		72.6
		Cardboard	2 estimated @ 400 lbs per bale x 363/2000		145.2		145.2

Non-Residential	Generator Type	Material Type (Example -	Specific Conversion Factor and	Source	Recycling	Composting	Total Tons
Generator Survey or	(Example - grocery	cardboard, glass, plastic, etc.)	Source or Actual Weight	Reduction	(Tons)	(Tons)	
Audit Identification	store, retail,			(Tons)			
Number	manufacturer)						
Subtotal -				9.075	217.8	36.3	263.175

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
1/A) 4	Date!	Dellare	Company estimates 12 pallets per day go to recycle. 12 pallets @ 40lbs (USEPA) x 6 days per week x 52		74.88		74.00
KN-4	Retail	Pallets	weeks per year.				74.88
Subtotal -				0	74.88	0	74.88
KN-5	Lumber	Metal	3 cy picked up 17 times in 2004 @ 906 lbs per cy (USEPA)		23.1	J	23.1
		Cardboard	3 cy once per week @ 100 lbs per cy x 52 weeks. (USEPA) 40 cy picked up 26 times in 2004 @		7.8		7.8
		Wood	329.5 per cy (Tellus)		171.34		171.34
Subtotal -				0	202.24	0	202.24
MP-1	Retail	Tires	7,395 tires @ 20 lbs each (USEPA)		73.95		73.95
Subtotal -				0	73.95	0	73.95
MP-2	Retail	Tires	500 tires @ 20 lbs each. (USEPA)		5		5

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
Subtotal -				0	5	0	5
MP-3	Retail	Tires	875 Tires @ 20 lbs each (USEPA)		8.75		8.75
Outral				0			8.75
Subtotal - ZN-2	Grocery	Cardboard	21 bales/week @ 400 lbs each = 436,800 lbs/2000 lbs. Estimated on site.	0	<b>8.75</b> 218.4	0	218.4
		Food Waste	Unable to quantify				
Subtotal -				0	218.4	0	218.4
ZN-3	Retail	Cardboard	One bale every 1.5 weeks @ 600 lbs per bale. 34 bales x 600/2000. Estimated on site.		10.2	U	10.2
		Paper	7 cubic yards per year @ 363.5 lbs per cy / 2000. Estimated on site.		1.27		1.27

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
Subtotal -				0	11.47	0	11.47
ZN-4	Retail	Cardboard	This business averages 17 bales per week @ 400 lbs 52 weeks per year. Estimated on site.		176.8		176.8
		Pallets	120 pallets recycled per week or 6,240 per year x 40 lbs per pallet (USEPA)		124.8		124.8
Subtotal -				0	301.6	0	301.6
ZN-5	Distributor	Sheet Rock	289 cy per year @ 393.5 lbs/cy. Estimated on site.		56.9	U	56.9
		Pallets	One bobtail every two months. 200 pallets x 6 = 1200 pallets x 40 lbs each / 2000 (USEPA)		24		24
Subtotal -				0	00.0	0	80.9
ZN-1	Grocery	Cardboard Food Waste	Actual  2 pallets per day X 365 days per year @ 600 lbs. 438,000 lbs. Estimate provided by manager.	228.33		219	228.33
		Plastic Stretch Wrap	3 bags@ 6 lbs per bag X 365 days. Estimate provided by manager.	3.285			3.285
			Store offers .05 cent credit for each bag customers reuse. In one week, the store had 1743 credits. 1743 x 52 = ~90,600 bags per year.  USEPA conversion factor is .77 for each 100 bags. 906 @ .77 lbs =				
		Plastic Bag	697.62 lbs or .35 tons per year/	0.35			0.35

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
Subtotal -				231.965	0	219	450.965
			Actual weights minus DOR reported		963.49		
KN-8	Recycler	OCC, Paper, Plastics, Aluminum	weights		903.49		963.49
Subtotal -				0	963.49	0	963.49
			Weight estimated by Company		400.5		
KN-9	Shredding Company	Paper	based on 30 businesses recycling ~ 6.166 tons per year		198.5		198.5
NIV 3	Officuality Company	Тарсі	0.100 tons per year				150.5
Subtotal -				0	198.5	0	198.5
Subtotal -			Actual weights provided by corporate			U	190.3
KN-10	Retail	Plastic	reports		38.36		38.36
			Actual weights provided by corporate		4.9		
		Cardboard	reports		4.3		4.9
		Paper	Actual weights provided by corporate reports		26.77		26.77
		i apoi	Actual weights provided by corporate				20.11
		Foam	reports		13.31		13.31

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
Subtotal -				0	83.34	0	83.34
KN-11	Recycler	Paper	40,000 lbs./month estimated by company		240	-	240
Cultatal					0.40		240
Subtotal -				0	240	0	240
Subtotal -				0	0	0	
Subtotal -				0	0	0	

Non-Residential Generator Survey or Audit Identification Number	Generator Type (Example - grocery store, retail, manufacturer)	Material Type (Example - cardboard, glass, plastic, etc.)	Specific Conversion Factor and Source or Actual Weight	Source Reduction (Tons)	Recycling (Tons)	Composting (Tons)	Total Tons
Subtotal -				0	0	0	
Subtotal -				U	U	U	
Subtotal -				0	0	0	
Subtotal -				0	0	0	
			-				
Subtotal -				0	0	0	
Grand Total				241	3,166	255	3,663
Grand Total				241	3,100	255	3,003

#### Section VI - Restricted Waste

For each restricted waste type (i.e., agricultural waste, inert solids, [e.g. concrete, asphalt, dirt, etc.] scrap metals and white goods [PRC section 41781.2]) and associated program or generator, please provide the following information:

Insert 1

1. If the diversion program started on or after January 1, 1990, complete the following table.

**Note**: Specific Program Name refers to one specific diversion program for that waste type (e.g., "Diversion conducted by city public waste dept."). Please input the complete program name with business type if appropriate. If you need to add additional programs, insert a row by clicking on the button for that section.

Restricted Waste Type	Audit Reference Number	Specific Program Name	Year Started	Generation Study Diversion Tonnage
Inert Solids	▼	C&D Sort	2002	2639
Inert Solids	▼	Drop Boxes	1991	2347
Inert Solids	▼	Street Maintenance/Sidewalk Repair	1998	17
Inert Solids	▼	ADC	1995	39
Inert Solids	▼	Landfill Salvage	2001	131
Inert Solids	▼	Landfill Salvage	1999	2841
Scrap Metal	KN-5	Business Recycling	1992	23
Scrap Metal	KN-8	Business Recycling	1995	136
Inert Solids	▼	Landfill Salvage	2001	1567

- 2. If the diversion program started before January 1, 1990 and if documentation on the program and waste type has not been approved by the Board, on a separate sheet marked "Attachment Section VI. 2", provide the documentation that indicates:
- How the diversion was the result of a local action taken by the jurisdiction, which specifically resulted in the diversion (PRC sec. 41781.2 [c] [1]).
- That the amount of that waste type diverted from the jurisdiction in 1990 was less than or equal to the amount of that waste type disposed at a permitted disposal facility by the jurisdiction in any year before 1990. (**Note**: this criterion is applicable to individual programs (PRc sec 41781.2(c)(2). Please include documentation.
- The jurisdiction is implementing, and will continue to implement, the diversion programs in its Source Reduction and Recycling Element.

**Note**: If documentation for a waste type and program has already been approved by the Board, you do not have to provide an "Attachment Section VI.2" for that waste type and program.

Instead please provide date of Board approval of previously submitted information.	(Date
instead please provide date of board approval of previously submitted information.	(Date

If documentation is not available, go to Number 4.

Insert 3

3. If the diversion program started before January 1, 1990, and the documentation requested in Section VI.2" is available (but not yet approved by the Board), complete the table below for each program claimed:

Restricted Waste Type	Audit Reference Number	Specific Program Name	Generation Study Diversion Tonnage
Pull Down for Waste Types			
Pull Down for Waste Types			
Pull Down for Waste Types			
Pull Down for Waste Types			
Pull Down for Waste Types			

4. If the diversion program started before January 1, 1990, and the documentation requested in Section VI.2 is not available, complete the table below for each program claimed:

	Restricted Waste Type	Audit Reference Number	Specific Program Name	Specific Program Generation Study Diversion Tonnage	1990 Diversion Tonnage	Difference	
--	-----------------------	------------------------------	-----------------------	---	---------------------------	------------	--